UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 2 4 2017

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ryan Nicholson, Sr. Environmental Compliance Coordinator
Blue Racer Midstream, LLC - Berne Plant
46277 Swazey Road
Lewisville, Ohio 43754

Re: Finding of Violation
Blue Racer Midstream, LLC
Lewisville, Ohio 43754

Dear Mr. Nicholson:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Blue Racer Midstream, LLC (Blue Racer or you) under Sections 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). We find that you are violating the following at your Berne Plant in Lewisville, Ohio: (1) Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for Which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015 at 40 C.F.R. §§ 60.5360-5430 (Subpart OOOO); and (2) Standards of Performance for Equipment Leaks of Volatile Organic Compounds (VOC) in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 at 40 C.F.R. §§ 60.480a - 60.489a (Subpart VVa).

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply, and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference. The EPA contact in this matter is Luke Hullinger. You may call him at (312) 886-3011 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following your receipt of this letter.

Sincerely,

Edward Nam
Director
Air and Radiation Division

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	
Blue Racer Midstream, LLC	)	**FINDING OF VIOLATION**
	)	
Lewisville, Ohio	)	
	)	
Proceedings Pursuant to	)	**EPA-5-17-OH-14**
the Clean Air Act,	)	
42 U.S.C. §§ 7401 et seq.	)	
	)	

FINDING OF VIOLATION

Based on available information, the U.S. Environmental Protection Agency finds that Blue Racer Midstream, LLC (Blue Racer) is violating the Clean Air Act (CAA) and its implementing regulations at the company's Berne Facility in Lewisville, Ohio. Specifically, Blue Racer is violating: (1) Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for Which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015 at 40 C.F.R. §§ 60.5360-5430 (Subpart OOOO); and (2) Standards of Performance for Equipment Leaks of Volatile Organic Compounds (VOC) in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 at 40 C.F.R. §§ 60.480a-60. 489a (Subpart VVa).

Statutory and Regulatory Authority

New Source Performance Standard Subpart A

1. Section 111 of the CAA, 42 U.S.C. § 7411, authorizes EPA to promulgate regulations establishing New Source Performance Standards (NSPS).

2. Section 111(e) of the CAA, 42 U.S.C. § 7411(e), states that "[a]fter the effective date of standards of performance promulgated under this section, it shall be unlawful for any owner or operator of any new source to operate such source in violation of any standard of performance applicable to such source."

3. Pursuant to Section 111 of the CAA, EPA promulgated 40 C.F.R. §§ 60.1-.19 (Subpart A).

4. Subpart A at 40 C.F.R. § 60.7(a)(1) requires "[a] notification of the date construction (or reconstruction as defined under §60.15) of an affected facility is commenced postmarked no later than 30 days after such date."

5. Subpart A at 40 C.F.R. § 60.7(a)(3) requires "[a] notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date."

6. Subpart A at 40 C.F.R. § 60.7(a)(5) requires "[a] notification of the date upon which demonstration of the continuous monitoring system performance commences in accordance with § 60.13(c). Notification shall be postmarked not less than 30 days prior to such date."

New Source Performance Standard Subpart OOOO

7. Pursuant to Section 111 of the CAA, EPA promulgated Subpart OOOO.

8. Subpart OOOO at 40 C.F.R. § 60.5365 states that an owner or operator of one or more of the onshore affected facilities listed in paragraphs (a) through (g) of this section for which construction, modification, or reconstruction commenced after August 23, 2011, and on or before September 18, 2015, is subject to the applicable provisions of Subpart OOOO.

9. Subpart OOOO at 40 C.F.R. § 60.5365(e) states that an onshore affected facility includes "[e]ach storage vessel affected facility, which is a single storage vessel located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment, and has the potential for VOC emissions equal to or greater than 6 tpy as determined according to this section by October 15, 2013 for Group 1 storage vessels and by April 15, 2014, or 30 days after startup (whichever is later) for Group 2 storage vessels, except as provided in [40 C.F.R. § 60.5365(e)(1) through (4)]. The potential for VOC emissions must be calculated using a generally accepted model or calculation methodology, based on the maximum average daily throughput determined for a 30-day period of production prior to the applicable emission determination deadline specified in this section. The determination may take into account requirements under a legally and practically enforceable limit in an operating permit or other requirement established under a Federal, State, local or tribal authority."

10. Subpart OOOO at 40 C.F.R. § 60.5430 defines a "storage vessel" as "a tank or other vessel that contains an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, or produced water, and that is constructed primarily of nonearthen (such as wood, concrete, steel, fiberglass, or plastic) which provide structural support." Tanks that are in service are considered storage vessels. *See* 40 C.F.R. §§ 64.5395(f) and 60.5430.

11. Subpart OOOO at 40 C.F.R. § 60.5430 defines a "Group 2 storage vessel" as a storage vessel "for which construction, modification or reconstruction has commenced after April 12, 2013, and on or before September 18, 2015."

12. Subpart OOOO at 40 C.F.R. § 60.5395(c) states that "[i]f you are the owner or operator of a Group 2 storage vessel affected facility, you must comply with [40 C.F.R. § 60.5395(d) through (g)]."

13. Subpart OOOO at 40 C.F.R. § 60.5395(e)(1) states "if you use a control device to reduce emission from your storage vessel affected facility, you must equip the storage vessel with a cover that meets the requirements of § 60.5411(b) and is connected through a closed vent system that meets the requirements of § 60.5411(c), and you must route emissions to a control device that meets the conditions specified in § 60.5412(c) and (d)."

14. Subpart OOOO at 40 C.F.R. § 60.5411(b)(2) states that "[e]ach cover opening shall be secured in a closed, sealed position (e.g., covered by a gasketed lid or cap) whenever material is in the unit on which the cover is installed" except during the instances listed in 40 C.F.R. § 60.5411(b)(2)(i) through (iv).

15. Subpart OOOO at 40 C.F.R. § 60.5411(b)(3) states that "[e]ach storage vessel thief hatch shall be equipped, maintained and operated with a weighted mechanism or equivalent, to ensure that the lid remains properly seated. You must select gasket material for the hatch based on composition of the fluid in the storage vessel and weather conditions."

16. Subpart OOOO at 40 C.F.R. § 60.5412(d)(2) provides that "[e]ach vapor recovery device (e.g., carbon adsorption system or condenser) or other non-destruction control device must be designed and operated to reduce the mass content of VOC in the gases vented to the device by 95.0 percent by weight or greater."

17. Subpart OOOO at 40 C.F.R. § 60.5365(f) states that "[t]he group of all equipment, except compressors, within a process unit is an affected facility." Section 60.5365(f)(3) further provides that "[t]he equipment within a process unit of an affected facility located at onshore natural gas process plants and described in paragraph (f) of this section are exempt from [Subpart OOOO] if they are subject to and controlled according to subparts VVa, GGG, or GGGa of [40 C.F.R. Part 60]."

18. Subpart OOOO at 40 C.F.R. § 60.5430 defines "process unit" as "components assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products, or other operations associated with the processing of natural gas products."

19. Subpart OOOO at 40 C.F.R. § 60.5430 defines a "natural gas processing plant (gas plant)" as "any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both."

20. Subpart OOOO at 40 C.F.R. § 60.5400 sets forth equipment standards that apply to the group of all equipment, except compressors, within a process unit.

21. Subpart OOOO at 40 C.F.R. §§ 60.5400(a), (b) and (d) through (f) require the owner or operator of an onshore affected facility, consisting of equipment within a process unit, to comply with the following standards of performance for equipment leaks in Subpart VVa:

a. The requirements at 40 C.F.R. §§ 60.482-1a(a), (b), and (d), 60.482-2a, and 60.482-4a through 60.482-11a., except as provided in § 60.5401, or in the alternative, the requirements of 40 C.F.R. §§ 60.483-1a and 60.483-2a;
b. The requirements of 40 C.F.R. § 60.485a, except as provided in 40 C.F.R. § 60.5400(f);
c. The requirements of 40 C.F.R. §§ 60.486a and 60.487a, except as provided in 40 C.F.R. §§ 60.5401, 60.5421, and 60.5422; and
d. The following provision is substituted for the requirements at 40 C.F.R. § 60.485a(d)(1): "Each piece of equipment is presumed to be in VOC service or in wet gas service unless an owner or operator demonstrates that the piece of equipment is not in VOC service or in wet gas service."

22. Subpart OOOO at 40 C.F.R. § 60.5401(b)(1) through (3) includes the following exceptions to the equipment leak standards of 40 C.F.R. § 60.5400(a) and (b):

a. Each pressure relief device in gas/vapor service may be monitored quarterly and within 5 days after each pressure release to detect leaks by the methods specified in 40 C.F.R. § 60.485a(b) of Subpart VVa, except as provided in 40 C.F.R. § 60.5400(c) and § 60.5401(b)(4), and 40 C.F.R. § 60.482-4a(a) through (c) of Subpart VVa;
b. If an instrument reading of 500 ppm or greater is measured, a leak is detected;
c. When a leak is detected, it must be repaired as soon as practicable, but not later than 15 days after it is detected, except as provided in 40 C.F.R. § 60.482-9a of Subpart VVa; and
d. A first attempt at repair must be made no later than 5 calendar days after each leak is detected.

NSPS Subpart VVa

23. Pursuant to Section 111 of the CAA, EPA promulgated Subpart VVa.

24. Subpart VVa at 40 C.F.R. § 60.482-1a(a) states that "[e]ach owner or operator subject to the provisions of this subpart shall demonstrate compliance with the requirements of §§ 60.482-1a through 60.482-10a or § 60.480a(e) for all equipment within 180 days of initial startup."

25. Subpart VVa at 40 C.F.R. § 60.482-1a(b) states that "[c]ompliance with §§ 60.482-1a to 60.482-10a will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures specified in § 60.485a."

26. Subpart VVa at 40 C.F.R. § 60.482-2a(a)(1) states "[e]ach pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in § 60.485a(b), except as provided in § 60.482-1a(c) and (f) and [40 C.F.R. § 60.482-2a(d) through (f)]. A pump that begins operation in light liquid service after the initial startup date for the process unit must be monitored for the first time within 30 days after the end of its startup period ... ."

27. Subpart VVa at 40 C.F.R. § 60.482-2a(a)(2) states that "[e]ach pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal, except as provided in § 60.482-1a(f)."

28. Subpart VVa at 40 C.F.R. § 60.482-11a(a) states that "[t]he owner or operator shall initially monitor all connectors in the process unit for leaks by the later of either 12 months after the compliance date or 12 months after initial startup."

29. Subpart VVa at 40 C.F.R. § 60.482-11a(d) states that "[w]hen a leak is detected pursuant to [40 C.F.R. § 60.482-11a(a) and (b)], it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in § 60.482-9a. A first attempt at repair as defined in this subpart shall be made no later than 5 calendar days after the leak is detected" from a connector.

30. Subpart VVa at 40 C.F.R. § 60.482-7a(a)(1) states that "[e]ach valve shall be monitored monthly to detect leaks by the methods specified in § 60.485a(b) and shall comply with paragraphs (b) through (e) of this section ... ."

31. Subpart VVa at 40 C.F.R. § 60.482-7a(a)(2) states that "[a] valve that begins operation in gas/vapor service or light liquid service after the initial startup date for the process unit must be monitored according to [40 C.F.R. § 60.482-7a(a)(2)(i) or (ii)] ... ."

32. Subpart VVa at 40 C.F.R. § 60.482-7a(a)(2)(i) states that a facility must "[m]onitor the valve as in paragraph (a)(1) of this section. The valve must be monitored for the first time within 30 days after the end of its startup period to ensure proper installation."

33. Subpart VVa at 40 C.F.R. § 60.482-7a(d)(2) states that "[a] first attempt at repair shall be made no later than 5 calendar days after each leak is detected" from a valve in gas/vapor and in light liquid service.

34. Subpart VVa at 40 C.F.R. § 60.485a(b) states "[t]he owner or operator shall determine compliance with the standards in §§ 60.482-1a through 60.482-11a, 60.483a, and 60.484a as follows: (1) Method 21 shall be used to determine the presence of leaking sources. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 of appendix A-7 of this part. ..."

35. For valves, Method 21 at § 8.3.1.1. instructs that to "[t]he most common source of leaks from valves is the seal between the stem and housing. Place the probe at the interface where the stem exits the packing gland and sample the stem circumference. Also, place the probe at the interface of the packing gland take-up flange seat and sample the periphery."

36. Subpart VVa at 40 C.F.R. § 60.482-10a(m) provides that "[c]losed vent systems and control devices used to comply with this subpart shall be operated at all times when emissions may be vented to them."

Findings of Fact

37. Blue Racer owns and operates an onshore natural gas processing plant, at 46277 Swazey Road, Lewisville, Ohio 43754, called the Berne Plant, which removes natural gas liquids from field gas.

38. On January 20, 2016, Blue Racer submitted an initial report for the month of June 2015 and the semiannual report for July 1, 2015 through December 31, 2015 to Ohio EPA for the Blue Racer Berne Plant under the reporting provisions of Subpart OOOO (and by reference Subpart VVa).

39. EPA conducted an inspection of the Berne Plant on August 30 through September 1, 2016 (August 2016 Inspection).

40. During the August 2016 Inspection, Blue Racer informed EPA that the Cryo 1 processing unit began operation in January 2015, and that both the Cryo 2 and the stabilizer processing units began operation in June 2015.

41. During the August 2016 Inspection, Blue Racer was unable to provide EPA with a notification submitted to the Administrator of the date construction, date of initial startup, and the date upon which demonstration of the continuous monitoring system performance commenced for the groups of all equipment within process units at the Berne Plant. In addition, Blue Racer was unable to provide EPA with a notification of the date upon which demonstration of the continuous monitoring system performance commenced for the affected storage vessels at the facility.

42. After reviewing Blue Racer's leak detection and repair (LDAR) database, which was provided during the August 2016 Inspection, EPA discovered that the following number of pumps were not monitored initially within 30 days of the start-up of the associated process unit:

Process Unit	Number of Pumps	Start-Up of Process Unit	Initial Monitoring Date
Cryo 1	4	January 2015	June 2015
Cyro 1	6	January 2015	July 2015
Cryo 1	2	January 2015	March 2016
Cryo 2	5	June 2015	September 2015
Cryo 2	2	June 2015	March 2016
Stabilizer	12	June 2015	October 2015

43. After reviewing Blue Racer's LDAR database, which was provided during the August 2016 Inspection, EPA discovered that the following number of valves were not monitored initially within 30 days of start-up of the associated process unit:

Process Unit	Number of Valves	Start-Up of Process Unit	Initial Monitoring Date
Cryo 1	2296	January 2015	June 2015
Cryo 1	261	January 2015	July 2016
Cryo 1	104	January 2015	August 2015
Cryo 1	4	January 2015	September 2015
Cryo 1	14	January 2015	October 2015
Cryo 1	4	January 2015	November 2015
Cryo 1	52	January 2015	December 2015
Cryo 1	36	January 2015	March 2016
Cryo 1	2	January 2015	July 2016
Cryo 1	493	January 2015	August 2016
Cryo 2	1466	June 2015	September 2015
Cryo 2	182	June 2015	October 2015
Cryo 2	3	June 2015	November 2015
Cryo 2	18	June 2015	December 2015
Cryo 2	31	June 2015	March 2016
Cryo 2	7	June 2015	May 2016
Cryo 2	697	June 2015	August 2016
Stabilizer	1507	June 2015	October 2015
Stabilizer	21	June 2015	December 2015
Stabilizer	8	June 2015	February 2016
Stabilizer	2	June 2015	March 2016
Stabilizer	2	June 2015	April 2016
Stabilizer	187	June 2015	August 2016

44. After reviewing Blue Racer's LDAR database, which was provided during the August 2016 Inspection, EPA discovered that the following number of connectors that were not monitored initially within 12 months of start-up of the associated process unit:

Process Unit	Number of Valves	Start-Up of Process Unit	Initial Monitoring Date
Cryo 1	10	January 2015	February 2016
Cryo 1	123	January 2015	March 2016
Cryo 1	1	January 2015	May 2016
Cryo 1	1	January 2015	June 2016
Cryo 1	3	January 2015	July 2016
Cryo 1	4217	January 2015	August 2016
Cryo 2	4715	June 2015	August 2016
Stabilizer	372	June 2015	August 2016

45. During the April 2016 Inspection, EPA observed the following valves that were insulated such that Method 21 could not be performed at the surface of the valve where leakage could occur: Tag # 002257, 002239, 002217, 002284, 002326, 002327, 002369, 002371, 002372, and 002475.

46. During the April 2016 Inspection, EPA observed condensate tanks and slop water tanks that are controlled by a vapor recovery unit and also have thief hatches. The thief hatches on top of one of the condensate tanks and two of the slop water tanks (each of the tanks is a storage vessel) were venting to atmosphere based on infrared camera video footage and/or instrument readings. In addition, the vapor recovery unit for these tanks was not operating during the inspection.

47. During the August 2016 Inspection, EPA reviewed records indicating Blue Racer did not complete weekly visual inspections of pumps associated with each of the Berne Plant's process units from January 2015 to August 2015 and the weeks of: January 3, 2016, February 7, 2016, February 29, 2016, March 6, 2016, April 3, 2016, May 1, 2016, June 12, 2016, June 19, 2016, and June 26, 2016.

48. In reviewing Blue Racer's leak history in the LDAR database, EPA discovered the following leaks at valves and connectors that did not have a first attempt at repair within 5 days of detection:

Tag #	Date of Leak	Initial Repair Date	Component Type
002020	10/2/2015	10/9/15	Valve
000668	10/5/2015	10/15/15	Valve
003388	10/13/2015	10/20/15	Connector
003402	10/13/2015	10/20/15	Connector
003512	10/13/2015	10/20/15	Connector
004995	10/29/2015	11/5/15	Valve
005801	10/30/2015	11/5/15	Valve
002494	10/7/2015	10/20/15	Connector
001982	10/6/2015	11/6/15	Connector

49. In reviewing Blue Racer's LDAR database, EPA discovered the following leaks that were not repaired within 15 days of detection:

Tag #	Date	Repair Date Time	Component Type
3491	10/6/15	10/26/15	Connector
3410	10/6/15	10/26/15	Connector

Alleged Violations

50. For the groups of all equipment within process units at the Berne Plant, Blue Racer failed to submit a notification to the Administrator of the date construction (or reconstruction as defined under § 60.15) of an affected facility is commenced postmarked no later than 30 days after such date in violation of 40 C.F.R. § 60.7(a)(1).

51. For the groups of all equipment within process units at the Berne Plant, Blue Racer failed to submit a notification to the Administrator of the actual date of initial startup of an affected facility postmarked within 15 days after such date in violation of 40 C.F.R. § 60.7(a)(3).

52. For the groups of all equipment within process units and affected storage vessels at the Berne Plant, Blue Racer failed to submit a notification to the Administrator of the date upon which demonstration of the continuous monitoring system performance commenced in accordance with § 60.13(c) in violation of 40 C.F.R. § 60.7(a)(5).

53. Blue Racer failed to perform the initial monthly monitoring of all pumps listed in Paragraph 42 within 30 days of the initial startup date of each process unit at the Berne Plant in violation of 40 C.F.R. §§ 60.5400(a) and 60.482-2a(a)(1).

54. Blue Racer failed to perform initial monthly monitoring of all valves listed in Paragraph 43 within 30 days of the initial startup date of each process unit at the Berne Plant in violation of 40 C.F.R. §§ 60.5400(a), 60.482-7a(a)(1), and 60.482-7a(a)(2)(i).

55. Blue Racer failed to perform initial monitoring on all connectors identified in Paragraph 44 within 12 months of the start-up of the associated process unit in violation of 40 C.F.R. §§ 60.5400(a) and 60.482-11a(a).

56. Blue Racer failed to perform Method 21 properly on 10 insulated valves listed in Paragraph 45 in violation of 40 C.F.R. §§ 60.5400(a) and 60.482-7a(a)(1) (and by reference 40 C.F.R. § 60.485a(b) and 40 C.F.R. Part 60, Appendix A-7, Method 21 §§ 8.3.1 and 8.3.1.1.

57. In violation of 40 C.F.R. § 60.5411(b)(2) and/or (3), Blue Racer failed to keep the thief hatches on the one condensate tank and two slop water tanks, listed in Paragraph 45, in a closed, sealed position when material was in these tanks; failed to equip, maintain, and/or operate these thief hatches with a weighted mechanism or equivalent to ensure that the lids remained properly seated; and/or failed to select gasket material for these thief hatches based on the composition of the fluids in the storage vessels and weather conditions.

58. Blue Racer failed to operate the vapor recovery unit for the one condensate tank and two slop water tanks, listed in Paragraph 46, at all times when emissions may be vented to it in violation of 40 C.F.R. §§ 60.5400(a) and 60.482-10a(m) and/or failed to operate the vapor recovery unit to reduce the mass content of VOC in the gases vented from these tanks by 95.0 percent weight or greater in violation of 40 C.F.R. § 60.5412(d)(2).

59. Blue Racer failed to perform weekly visual inspections on pumps in each of the process units at the Berne Plant for the periods identified in Paragraph 47 in violation of 40 C.F.R. §§ 60.5400(a) and 60.482a(a)(2).

60. Blue Racer failed to make timely first attempts at repairs within 5 days of detecting leaks from the valves listed in Paragraph 48 in violation of 40 C.F.R. §§ 60.5400(a) and 60.482-7a(d)(2).

61. Blue Racer failed to make timely first attempts at repairs within 5 days of detecting leaks from the connectors listed in Paragraph 48 in violation of 40 C.F.R. §§ 60.5400(a) and 60.482-11a(d).

62. Blue Racer failed to make timely repairs within 15 days of detecting leaks from the connectors listed in Paragraph 49 in violation of 40 C.F.R. § 60.5401(b).

Enforcement Authority

63. Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), provides that whenever, on the basis of any information available to the Administrator, the Administrator finds that any person has violated, or is in violation of, any requirement or prohibition of, *inter alia*, any rule promulgated under the NSPS requirements of Section 111(e) of the CAA, 42 U.S.C. § 7411(e), the Administrator may issue an administrative penalty order under Section 113(d), issue an order requiring compliance with such requirement or prohibition, or bring a civil action pursuant to Section 113(b) for injunctive relief and/or civil penalties.

Environmental Impact of Violations

64. Blue Racer's above-referenced violations have caused excess emissions of VOC.

65. Excess VOC emissions can cause eye, nose, and throat irritation; headaches, loss of coordination, nausea; damage to the liver, kidney, and central nervous system. Some VOCs can cause cancer in animals and some are suspected or known to cause cancer in humans.

66. VOC emissions are a precursor to ground-level ozone. Breathing ozone contributes to a variety of health problems including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level ozone also can reduce lung function and inflame lung tissue. Repeated exposure may permanently scar lung tissue.

7/24/17
Date

Edward Nam
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Kathy Jones, certify that I sent a Finding of Violation, No. EPA-5-17-OH-14, by Certified Mail, Return Receipt Requested, to:

Ryan Nicholson, Senior Environmental Compliance Coordinator
Blue Racer Midstream LLC
46277 Swazey Road
Lewisville, Ohio 43754

I also certify that I sent copies of the Finding of Violation by first-class mail to:

Bob Hodanbosi
Chief
Division of Air Pollution Control
bob.hodanbosi@epa.ohio.gov

Lisa Duvall
Southeast District Office
Ohio Environmental Protection Agency
lisa.duvall@epa.ohio.gov

On the 20th day of July 2017.

Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7016 1370 0001 5719 9261